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February 7, 2019

VIA ECF

Hon. J. Paul Oetken United States District Judge 40 Foley Square New York, New York 10007

Re: Spray Moret, LLC v. Hudson Outerwear Inc. et al., 18-cv-09920 (CM)

Dear Judge Oetken:

We represent Defendants Hudson Outerwear Inc., Maxima Apparel Corp., Maxima ECommerce Holdings LLC and Maxima Global Holdings LLC (collectively, "Defendants") in the above-referenced action. We write, pursuant to Rule 3.C of your Honor's individual rules, to seek a thirty (30) day extension of time from February 13, 2019 until March 15, 2019 for Defendants to answer or move with respect to the complaint in this action.

There have been no previous requests for extensions of the answer deadline. Opposing counsel has refused to consent to the extension, taking the position that Defendants have been aware of this matter for some time and thus should not require additional time. However, while the parties were engaged in settlement negotiations for some period of time, our clients only just received a copy of the final 22 page complaint that was served through the Secretary of State on January 23, 2019. Although I had requested in writing on January 2, 2019 that opposing counsel notify me if and when he effected service of the complaint, opposing counsel did not provide either that professional courtesy or the courtesy of an initial extension. Inasmuch as Defendants have been selling some of the products bearing the allegedly infringing design at issue since 2012, the brief extension of time sought will cause no prejudice to Plaintiff.

Respectfully,

/s/ Kieran G. Doyle

Kieran G. Doyle

cc: Plaintiff's Counsel (via ECF)